

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**JOINT MOTION TO DISMISS WITH PREJUDICE**

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants Johnson & Johnson, Inc., Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move the court to dismiss with prejudice this action and all claims against the Ethicon Defendants which were, or could have been asserted, pursuant to F. R. Civ. P. 41(a)(1)(A)(ii).

Each party shall bear her or its own costs.

Respectfully submitted,

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**EXHIBIT A**

<b>Civil Action Number</b>	<b>Case Name</b>
2:15-cv-11961	Bender v. J&J
2:14-cv-02179	Chaney v. Ethicon
2:15-cv-12065	Demonnd v. Ethicon
2:14-cv-02405	Erickson v. Ethicon
2:14-cv-06658	Garland v. Ethicon
2:14-cv-06302	Givens v. Ethicon
2:14-cv-30008	Goodwin v. Ethicon
2:14-cv-29681	Green v. Ethicon
2:15-cv-12128	Hastings v. Ethicon
2:14-cv-02630	Jones v. Ethicon
2:14-cv-01227	Langell v. Ethicon
2:15-cv-12212	Lyles v. Ethicon
2:13-cv-00587	Orgeron v. Ethicon
2:14-cv-06377	Paz v. Ethicon
2:15-cv-11214	Pettit v. Ethicon
2:15-cv-02303	Pingolt v. Ethicon
2:12-cv-09947	Quintana v. Ethicon
2:14-cv-04042	Ribitzki v. Ethicon

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

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